

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

BCS SERVICES, INC. and PHOENIX)
BOND & INDEMNITY COMPANY,)
) No. 07 C 1367
Plaintiffs,)
v.)
)
HEARTWOOD 88, INC., et al.,)
)
Defendants.

NOTICE OF FILING

To: See Attached Service List

PLEASE TAKE NOTICE that on November 5, 2009, we caused to be filed with the Clerk of the Court for the Northern District of Illinois, *Defendants' Motion to Excuse Personal Appearance*.

**ANTHONY DELAURENTIS
BAMP, LLC
RICHARD TURER
RICHARONY, LLC**

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)
Defendants.)

DEFENDANTS' MOTION TO EXCUSE PERSONAL APPEARANCE

Defendants, **ANTHONY DELAURENTIS, BAMP, LLC, RICHARD TURER, and RICHARONY, LLC** ("Defendants"), by their attorney, Elisha S. Rosenblum, pursuant to all applicable Federal Rules of Civil Procedure, respectfully request that Mr. Anthony DeLaurentis and Mr. Richard Turer be excused from appearing personally at the settlement conference set for November 16th and November 17th before Judge Valdez. In support of said motion, the Defendants state as follows:

1. Mr. DeLaurentis resides in Maryland. His wife (Carole DeLaurentis) is gravely ill with severe and complex cardiovascular medical conditions. She has been hospitalized seven times between May-September of 2009, and is currently under the care of several doctors whom she sees at least twice a week in Maryland. Mr. DeLaurentis is her sole caretaker with regard to her medical care, and cannot leave the State of Maryland for any reason at this point in time. Mr. DeLaurentis will be represented by counsel (with final settlement authority) at the settlement conference, and will make himself available by phone at all times required by the Court.

2. Mr. Turer resides in Ohio. Mr. Turer is currently under the care of Dr. Blair Vermillion in Columbus, Ohio for the treatment of blood clots in his lower extremities. Mr. Turer has been told by his doctor not to travel at this point in time due to this medical condition. Mr. Turer will be represented by counsel (with final settlement authority) at the settlement conference, and will make himself available by phone at all times required by the Court.

Wherefore, based upon the foregoing, Defendants request an order granting this motion.

**ANTHONY DELAURENTIS, BAMP, LLC
RICHARD TURER, and RICHARONY, LLC**

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CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that he caused copies of the foregoing document to be served upon the following individuals by facsimile and by regular U.S. Mail, by depositing the same in the U.S. mail, properly addressed with proper postage prepaid, from 650 Dundee Road, Suite 475, Northbrook, Illinois 60062, on or before the hour of 5:00 p.m. on November 5, 2009.

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